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Attorneys for Richard A. Marshack,  
Trustee of the LPG Liquidation Trust

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**SANTA ANA DIVISION**

In re:

The Litigation Practice Group P.C.,

Debtor.

Richard A. Marshack, Trustee of the LPG  
Liquidation Trust,

Plaintiff,

v.

Oxford Knox, LLC, a Delaware limited liability  
company; Buffalo 21 Partners, Inc., a Wyoming  
corporation; Rick Emmett, individually; Ryan  
Taylor Connet, individually; Obrik, Inc., a  
Wyoming corporation; Albright, Inc., a Florida  
corporation; Jason Dovalina, individually; Rachel  
Dovalina, individually; Final Season, Inc., a  
California corporation; Factor In, Inc., a  
California corporation; Syed Faisal Gilani aka  
Sye Gilani, individually; BAE Enterprises, Inc., a  
Wyoming corporation; Rose Bianca Lori,  
individually; Decacorn Holdings, Inc., a

Chapter 11

Case No. 8:23-bk-10571-SC

Adv No. 8:25-ap-01208-SC

**STIPULATION BETWEEN PLAINTIFF  
RICHARD A. MARSHACK, TRUSTEE OF  
THE LPG LIQUIDATION TRUST AND  
ALL DEFENDANTS EXCLUDING BAE  
ENTERPRISES, INC. AND ROSE BIANCA  
LOLI FOR EXTENSION OF DEADLINES  
AND TO CONTINUE/RESCHEDULE PRE-  
TRIAL CONFERENCE**

Honorable Scott C. Clarkson  
Dept. 5C

California limited liability company; Samson Ly, individually; BEW Solar Management, LLC, a California limited liability company; Sean Stephens, individually; Lexicon Consulting, LLC, a California corporation; Daniel Lansdale, individually; United Partnerships, LLC, a California corporation; Ventura Consulting, LLC, a Nevada limited liability; Matthew Church, individually; Frank Brown, individually; Validation, LLC, a terminated California limited liability company; Innovative Solutions, LLC, a Wyoming corporation; MRJR20 Partners, LLC, a California limited liability company; MFCR, Investments, LLC, a Florida limited liability company; Lifesize, Inc., a Wyoming corporation.; Karrington, Inc., a Wyoming corporation; Spectrum Payment Solutions, LLC, a California limited liability company; Jason D. Williams, individually; Home Energy Solutions, Inc., a California corporation; The Coelho Irrevocable Life Insurance Trust, a California trust; JNR Services, Inc., a California corporation; C.A.T. Exteriors, Inc., an Arizona corporation; AZLS Enterprises, Inc, a California corporation; A Solution Debt Relief, Inc., a Wyoming corporation and INVESTLINC Wealth Services, Inc., a California corporation,

Defendants.

**TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE, AND ALL INTERESTED PARTIES:**

This Stipulation ("Stipulation") is entered into by and between Plaintiff Richard A. Marshack, the Trustee of the Liquidating Trust ("Trustee" and/or "Plaintiff") for the bankruptcy estate ("Estate") of The Litigation Practice Group PC ("Debtor" or "LPG"), and in the above-captioned bankruptcy, and all Defendants listed in the caption above except for BAE Enterprises, Inc. and Rose Bianca Loli, by and through their counsel, Golden Goodrich, LLP (these Defendants together with Trustee the "Parties"), pursuant to LBR 7016-1(a)(5) with regard to the following.

**RECITALS**

A. On or about March 17, 2025, the Trustee filed the above captioned adversary proceeding against the Defendants. Pursuant to the issued summons, the Defendants' responsive pleading was due on or before May 7, 2025.

1 B. On March 24, 2025, the Court entered an Order Scheduling a Status Conference on  
2 May 28, 2025 ("Order") [Dkt. No. 4]. The Order also established meet and confer and other deadlines  
3 for counsel in advance of the Status Conference.

4 C. Although the Parties are cooperating to ensure the Court's deadlines are timely met,  
5 there are 38 named defendants<sup>1</sup> in this Adversary. Accordingly, the Parties need additional time to  
6 comply with all of the requirements of Rule 26(f), including the production of documents by each  
7 Defendant, a comprehensive list of witnesses for each Defendant, and the possible settlement of claims  
8 against one or more Defendants, to the extent possible. Given these facts, the Parties would like  
9 additional time comply with Rule 26(f) and request the Court continue the schedule status conference  
10 scheduled for May 28, 2025 ("May 28<sup>th</sup> Status Conference"), continue the Rule 26(f) deadlines, and  
11 the pre-trial deadlines, including the deadlines to complete discovery and file any motions related to  
12 discovery, established by the Court's Order Re: Early Meeting of Counsel.

13 WHEREFORE, the Parties agree and stipulate to the following:

14 1. The Defendants identified herein waive service of process of the complaint and  
15 acknowledges service of the complaint through their undersigned counsel and shall have until June 6,  
16 2025 to answer or otherwise respond to the Complaint.

17 2. Subject to Court approval, the May 28<sup>th</sup> Status Conference shall be continued to July  
18 17, 2025 at 1:30 p.m. ("Continued Status Conference").

19 3. The deadlines established by the Court's Order Re: Early Meeting of Counsel are  
20 vacated.

21 4. A status report shall be filed fourteen days before the Continued Status Conference,  
22 and the Parties will hold their Rule 26(f) meeting on or before June 26, 2025 with an exchange of  
23 initial disclosures to occur on or before June 30, 2025.

24 5. Except as set forth herein, the Parties reserve all rights and claims against the other.

25 6. This Stipulation may be executed in one or more counterparts, and facsimile or  
26 electronic signatures may be used in filing this document with the Court.

27  
28 <sup>1</sup> Validation Partners, LLC was dismissed by Plaintiff on March 19, 2025. (Dkt. No. 3).

1 Dated: May 13, 2025

DINSMORE & SHOHL LLP

2  
3 By: /s/ Tyler Powell

YOSINA M. LISSEBECK

4 TYLER POWELL (pro hac vice)

5 Attorneys for Plaintiff Richard A. Marshack, Trustee of  
6 the LPG Liquidation Trust

7 Dated: May 13, 2025

GOLDEN GOODRICH LLP

8  
9 By: 

JEFFREY GOLDEN

DAVID GOODRICH

10 *Counsel for Defendants Oxford Knox, LLC; Buffalo*  
11 *21 Partners, Inc.; Rick Emmett, Ryan Taylor Connet;*  
12 *Obrik, Inc.; Albright, Inc.; Jason Dovalina; Rachel*  
13 *Dovalina; Final Season, Inc.; Factor In, Inc.; Syed*  
14 *Faisal Gilani aka Sye Gilani; Decacorn Holdings,*  
15 *Inc.; Samson Ly; BEW Solar Management, LLC; Sean*  
16 *Stephens; Lexicon Consulting, LLC; Daniel Lansdale;*  
17 *United Partnerships, LLC; Ventura Consulting, LLC;*  
18 *Matthew Church; Frank Brown; Validation, LLC;*  
19 *Innovative Solutions, LLC; MRJR20 Partners, LLC;*  
20 *MFCR Investments, LLC; Lifesize, Inc.; Karrington,*  
21 *Inc.; Spectrum Payment Solutions, LLC; Jason D.*  
22 *Williams; Home Energy Solutions, Inc.; The Coelho*  
23 *Irrevocable Life Insurance Trust; JNR Services, Inc.;*  
24 *C.A.T. Exteriors, Inc.; AZLS Enterprises, Inc.; A*  
25 *Solution Debt Relief, Inc.; and INVESTLINC Wealth*  
26 *Services, Inc.*

**PROOF OF SERVICE**

I am over the age of 18 and not a party to this case. My business address is **655 W. Broadway, Suite 800, San Diego, California 92101**. True and correct copies of the foregoing documents:

**STIPULATION BY AND BETWEEN PLAINTIFF RICHARD A. MARSHACK, TRUSTEE OF THE LPG LIQUIDATION TRUST AND ALL DEFENDANTS EXCLUDING BAE ENTERPRISES, INC. AND ROSE BIANCA LOLI FOR EXTENSION OF DEADLINES AND TO CONTINUE/RESCHEDULE PRE-TRIAL CONFERENCE**

will be served in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On \_\_\_\_\_, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Richard A Marshack (TR)** - pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Tyler Powell** - tyler.powell@dinsmore.com, jennifer.pitcock@dinsmore.com; wendy.yones@dinsmore.com
- **United States Trustee (SA)** - ustpregion16.sa.ecf@usdoj.gov

**2. SERVED BY UNITED STATES MAIL:** On **May 16, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**SEE ATTACHED SERVICE LIST**

**3. BY ELECTRONIC MAIL:** On **May 16, 2025**, I caused such documents described herein to be sent to the person(s) at the e-mail addresses listed below. I did not receive within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

**4. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 16, 2025

Wendy A.Yones

/s/ Wendy A. Yones

*Date*

*Printed Name*

*Signature*

1 Oxford Knox, LLC  
2 Attn: Richard R Emmett, Partnership Representative  
3 251 Little Falls Drive  
4 Wilmington, Delaware 19808

5 Buffalo 21 Partners, Inc.  
6 Attn: Richard R Emmett, CEO  
7 10 Pointe Drive, Suite 150  
8 Brea, CA 92821

9 Rick Ronald Emmett  
10 10 Pointe Drive, Suite 150  
11 Brea, CA 92821

12 Ryan Taylor Connet  
13 4155 E La Palma Avenue  
14 Anaheim, CA 92807

15 Obrik, Inc  
16 Attn: Cloud Peak Law, Registered Agent  
17 1095 Sugarview Drive, Suite 500  
18 Sheridan, Wyoming 82801

19 Jason Dovalina  
20 128 W Santa Fe Avenue, Suite C  
21 Placentia, CA 92870-5632

22 Rachel Dovalina  
23 736 Oceanview Drive  
24 Fullerton, CA 92832

25 Factor In, Inc.  
26 Attn: Sye Gilani, Registered Agent  
27 7651 Greenock Way  
28 Riverside, CA 92508

Syed Faisal Gilani aka Sye Gilani  
7651 Greenock Way  
Riverside, CA 92508

Bae Enterprises, Inc.  
Attn: Cloud Peak Law, LLC, Registered Agent  
1095 Sugarview Drive, Suite 500  
Sheridan, Wyoming 82801

Rose Bianca Loli  
33741 Alcazar Drive  
Dana Point, CA 92629

1 Rose Bianca Loli  
2 1220 Ensenada Avenue  
3 Laguna Beach, CA 92651

4 Samson Ly  
5 208 S Moore Avenue, Apt D  
6 Monterey Park, CA 91754

7 BEW Solar Management, LLC  
8 Attn: Sean M Stephens, Manager  
9 2560 N Synergy Avenue  
10 Eagle, Idaho 83616

11 Sean M Stephens  
12 2560 N Synergy Ave  
13 Eagle, Idaho 83616

14 Daniel Lansdale  
15 515 W Commonwealth Avenue, Suite 211  
16 Fullerton, CA 92832

17 United Partnerships, Inc.  
18 7300 Lennox Avenue, Room J-14  
19 Van Nuys, CA 91405

20 Ventura Consulting, LLC  
21 Attn: Matthew Church, Managing Member  
22 708 Grandview Avenue  
23 Fullerton, CA 92832

24 Ventura Consulting, LLC  
25 Attn: Matthew Church, Managing Member  
26 10620 Southern Highlands Parkway, Suite 110-18  
27 Las Vegas, NV 89141

28 Matthew Church  
708 Grandview Avenue  
Fullerton, CA 92832

Matthew Church  
10620 Southern Highlands Parkway, Suite 110-18  
Las Vegas, NV 89141

Frank Brown  
10620 Southern Highlands Parkway, Suite 110-18  
Las Vegas NV 89141

1 Frank Brown  
2 10881 Pentland Downs Street  
3 Las Vegas, NV 89141  
4 Validation, LLC  
5 Attn: Matthew Church  
6 708 Grandview Avenue  
7 Fullerton, CA 92832  
8 Validation, LLC  
9 Attn: Matthew Church  
10 10620 Southern Highlands Parkway, Suite 110-18  
11 Las Vegas, NV 89141  
12 Innovative Solutions, Inc.  
13 Attn: Cloud Peak Law, LLC, Registered Agent  
14 1095 Sugarview Drive, Suite 500  
15 Sheridan, Wyoming 82801  
16 MRJR20 Partners, LLC  
17 Attn: Rick R Emmett, Registered Agent  
18 10 Pointe Drive, Suite 150  
19 Brea, CA 92821  
20 Lifesize, Inc.  
21 Attn: Cloud Peak Law, LLC, Registered Agent  
22 1095 Sugarview Drive, Suite 500  
23 Sheridan, Wyoming 82801  
24 Karrington, Inc.  
25 Attn: Company Sage Agents, LLC, Registered Agent  
26 1095 Sugarview Drive, Suite 100  
27 Sheridan, Wyoming 82801  
28 Spectrum Payment Solutions, LLC  
Attn: Samson Ly  
208 S Moore Avenue, Apt D  
Monterey Park, CA 91754  
Jason D Williams  
4155 E La Palma Avenue  
Anaheim, CA 92807  
Home Energy Solutions, Inc.  
Attn: Rick R Emmett, Financial Manager  
300 S Harbor Boulevard, Suite 1000  
Anaheim, CA 92805



1 The Coelho Irrevocable Life Insurance Trust  
2 Attn: Rick R Emmett  
3 300 S Harbor Boulevard, Suite 1000  
4 Anaheim, CA 92805

4 JNR Services, Inc.  
5 Attn: Rick R Emmett  
6 10 Pointe Drive, Suite 150  
7 Brea, CA 92821

7 CAT Exteriors, Inc.  
8 Attn: Rick R Emmett  
9 10 Pointe Drive, Suite 150  
10 Brea, CA 92821

10 AZLS Enterprises Inc.  
11 Attn: Hee S Noh  
12 9 Traditional Place  
13 Irvine, CA 92602

13 A Solution Debt Relief, Inc.  
14 Attn: Cloud Peak Law, LLC, Registered Agent  
15 1095 Sugar View Drive, Suite 500  
16 Sheridan, WY 82801

16 Investlinc Wealth Services, Inc.  
17 Attn: West A Cohan  
18 10 Pointe Drive, Suite 150  
19 Brea, CA 92821

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